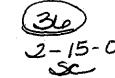
CARAL



IN The United States District Court

FOR the Middle District of PENNSYLVANIA

BRIAN Douglas plaintiff

civil Action-LAW

HARRISBURG, E

No. FOO-CY-0982

MARTINE HOPEN, Et AL defendants

FEB 1 4 2001

LEDWANNED- LEWENTED

MARY E D'ANDREA, CLER

Judge Sylvia FAMED

Plaintiff's Response/Answers to defendants Motion(s) to dismiss

Plaintiff did not receive a copy of said motions to dismiss until 3 Feb. 2001,

The date plaintiff was returned to sci-camp HILL. SEE Attached Exhibits.

Plaintiff hereby RESPONDS/ANSWERS to defendants) Motions to dismiss Accordingly:

- I. The plaintiff hereby withdrawals any alleged claims with respect to megan's law.
- 2. The plaintiff hereby with drawels any Aleped claims with Respect to the operation of

  the sex offenders program, with the exception as to discriminatory practices employed

  by named defendants, the labeling of uniform by same, that indicate to other assaultive
- INMATES, that plaintiff is a sex off ender, and false retailed only misconduct splacements in 3. As to plaintiff allegations of conspiracy, it should be noted that plaintiffs or ipinal
- complaint does set first with specificity A chromology of events where the defendant

had a meeting of the points, to cause, bring about and/or degrees said pinintiff of

Rights, priviledges and immunities secured by our united states constitution, or by

virtue of any laws of constitutional comesquence; for excersising Rights (grisyance

4. The plaintiff is a prose litipant, and cannot, should not and ought not be held to the

SAME standards as any members of the bar of this court.

5. As to any claims not pursued on administrative appeals, plaintiff withdrawale any

- 5. As to ANY claims not pursued on Administrative Appeals, plaintiff withdrawale Any
  Alleped claims with respect to some, with the exception as to Any claims that were
  subsequently pursued on an appeal that are contained subject matter on those that
  which were precessed on soundaministrative appeals of record. All other Administrative processes have been exhausted.
- 6. Phintiff withdrawals any alleged claims with Respect to defendants Hamberge, Gimble
  And gault, with the exception as to Any chims, thus indicative, consequence; that tends
  to support plaintiffs sequential conspiracy allegations.
- 7. PLAINTHE WITH DRAWNER ANY ALLEGEN CLAIMS AS to defendent world.
- 8. As to plaintiffs conspiracy allegations, the defendants utilized their authoritative positions, to discriminate, retaliate, cause physical loguey, and to interfere, imper and/or deprive plaintiff of rights, priviledges and immunities secured by our united states constitution or by virtue of any laws of conditutional consequences.

  9. As to defendant Lasky, plaintiff submitted immate grisevancess, and saidgrevances were processed and investigated. Delasky is fully awarse of the content of same, and

said gaievapocecs) were appealed. Moreover and aside from same the defendant alid not file an auswer to the specific claims of allegation contained in the compliant and instead, has elected to rely upon a detented to failure to exhaust administration remedies, and proposes that this court dismiss suit as to same with prejudice and as a prose litipant, leave to amend as to defendant lasky should be granted

Case	1:00-cv-00982-SHR-KH	Document 36	Filed-02/14/2001	Page 3 of 6

should this count (although unlikely), Fine	tent k	phintiffs chimes	asto same, are
LACKING IN MERIT OR FACTUAL Specificity.	·		

FOR THE FOREgoing REASONS, defendants motioniss to dismiss should be denied, in part, and granted, in part.

RESpectfully Submitted,

BRIAN DOUGLAS DP-1285

Box 200, 2500 Lisburn Rd.

CAMP HILL, PA-17001-0200

Pro SE/PWINTY

DATEd: 10 February 2001

## VERIFICATION

I Brian boughes, plaintiff, prose do hereby verify under the penalty of perjury, that the facts contained here in (if any), are true to the best of my knowledge, inferentian and for belief.

BICIAN DOUBLAS, DP-1285

Box 200, 2520 Lisburn Rd

CAMP HILL, PA. 17001-0200

DATEd: b Februareu

## ceretificate of SERVICE

I, BRIAN DOUGHS, plaintiff, do hereby certify that I have served true and copies of Plaintiff's response (Answer too defendants) motions to dismiss, upon the below indicated, by united states mail, on this what day of February 2001.

BRIAN DOUPLAS DP-1285

Box 200, 2520 Lisburn Rd.

CAMP HILL PA 17001-0200

Plaintiff/prose

DATEd: 10 FEBRUARY Zool.

IN THE MATTER OF

IN THE COURT OF COMMON PLEAS OF

JASMINE MARIE HANNA

DAUPHIN COUNTY, PENNSYLVANIA

ORPHANS' COURT DIVISION

A MINOR UNDER THE AGE

OF 18 YEARS

NO. 5528-2000

## NOTICE OF HEARING

A petition has been filed asking the Court to put an end to all rights you have to your child, Jasmine Marie Hanna. The Court has set a hearing to consider ending your rights to your child. That hearing will be held in the Dauphin County Courthouse, Front and Market Streets, Harrisburg, Pennsylvania in Courtroom 5 on Common 29,2001 , at 1:30 P.M. You are warned that even if you fail to appear at the scheduled hearing, the hearing will go on without you and your rights to your child may be ended by the Court without your being present. You have a right to be represented at the hearing by a lawyer. You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

> Dauphin County Lawyer Referral Service 213 North Front Street Harrisburg, PA 17101 (717) 232-7536

> > DAUPHIN COUNTY SOCIAL SERVICES

FOR CHILDREN AND YOUTH

Marion E. MacIntyre, Esquir

NOTICE IS TO:

COPY TO:

Robin Hanna 20 C Hall Manor Harrisburg, PA 17104 Brian Douglas Camp Hill S.C.I. DP1285 P. O. Box 200

Camp Hill, PA 17011-0200

DATED: January 16,2001 DATED: January 16,2001

IN THE MATTER OF

IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY, PENNSYLVANIA

JASMINE MARIE HANNA

A MINOR UNDER THE AGE

ORPHANS' COURT DIVISION

OF 18 YEARS

NO. 5528-2000

## PRELIMINARY DECREE

AND NOW this 5 day of December, 2000, upon consideration of the Petition herein and upon the Motion of Marion E.

MacIntyre, Attorney for the Petitioner, it is hereby ORDERED and DECREED that a hearing be held on the Adday of January, 2001, at //30 o'clock P.M. in Court Room 5, Fifth Floor, Dauphin County Court House, Harrisburg, Pennsylvania.

IT IS FURTHER ORDERED that the Petitioner shall give notice of the time and place of the above hearing to the Father of Jasmine Marie Hanna, Brian Douglas, as prescribed by the Adoption Act by personal service or by certified mail to his last known address not less than 10 days before said hearing.

BY THE COURT:

Hodel Hoover

J.